

From: [Eyth, Alison](#)
To: [Palma, Elizabeth](#)
Subject: FW: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA
Date: Wednesday, October 10, 2018 11:09:25 PM

From: Cathe Kalisz [<mailto:kaliszc@api.org>]
Sent: Wednesday, June 14, 2017 4:22 PM
To: Eyth, Alison <Eyth.Alison@epa.gov>
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Okay. Thanks for being so accommodating. I'm still trying to load some of the control files into Excel and make sense of them; hopefully I'll have things figured out before we talk in the morning.

From: Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]
Sent: Wednesday, June 14, 2017 4:19 PM
To: Cathe Kalisz
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Yes, before 9. I think I should be at my desk by 8:30.

Alison

From: Cathe Kalisz [<mailto:kaliszc@api.org>]
Sent: Wednesday, June 14, 2017 4:03 PM
To: Eyth, Alison <Eyth.Alison@epa.gov>
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Alison,

Are you available to touch base first thing in the morning?

Cathe

From: Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]
Sent: Wednesday, June 14, 2017 11:38 AM
To: Cathe Kalisz; Possiel, Norm
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Hi Cathe,

I got your voicemail, and missed your available window to call back. Unfortunately I have meetings from 11-4 today, but if there are more questions after that time I can try to answer them then.

In the list of 2023_CoST_Packets folder (CoST stands for Control Strategy Tool), the files have either Projection, Control, or Closures in the early part of their name. An example of a control packet is CONTROL_CISWI_2011v6_22nov2013_v0, and example of a closures packet is CLOSURES_2011v6_2_v4fix_31aug2015_15sep2016_v7.

The files are all text files and because they came from a Linux system are probably best opened with Wordpad, or read into Excel as a delimited file using semicolon (;) as the delimiter so they can see the data in its various columns. Sorry I didn't have time to reformat these to make this a little easier. If people struggle with the current files, we can try to provide something more formatted by next week sometime.

I hope that helps,

Alison

From: Eyth, Alison
Sent: Tuesday, June 13, 2017 4:57 PM
To: 'Cathe Kalisz' <kaliszc@api.org>; Possiel, Norm <Possiel.Norm@epa.gov>

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Hi Cathe,

I've attached a zip (renamed .piz) of the txt versions of the files we use for the projections as described in the TSD – also attached.

In the individual files, the control type packets have these columns:

fips;sc;poll;pri_cm_abbrev;ceff;reff;rpen;sic;mact;application_control;replacement/addon;plantid;pointid;stackid;segment;compliance date;naics;comments

The projection packets have these columns:

fips;sc;proj_factor;poll;sic;mact;plantid;pointid;stackid;segment;naics;char_5;comments

The closure packets have these columns:

fips;plantid;pointid;stackid;segment;plant;effective_date;reference;comments

To find adjustments for specific facilities, they can look for the value in plantid = EIS facility ID, pointid = EIS unit ID, and stackid=EIS release point id.

If the rules you are asking about below are recently finalized (I need to check with our SPPD staff on this), then they are not included in our existing projections. The list of rules included is in Table 4-1 of the TSD.

Thanks,

Alison

From: Cathe Kalisz [<mailto:kaliszc@api.org>]

Sent: Tuesday, June 13, 2017 10:49 AM

To: Eyth, Alison <Eyth.Alison@epa.gov>; Possiel, Norm <Possiel.Norm@epa.gov>

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Norm and Alison,

I'm passing along a specific question from one of our members for the discussion next week.

"We would like to hear if and how the more stringent emission standards (emission controls, work practice standards) required by NSPS Ja, MACT CC and MACT UUU are addressed in the "future year emissions".

- NSPS Ja – Flares (NOx, SO2, VOC); Process heaters (NOx and SO2)
- MACT CC – flares (VOCs); delayed cokers (VOCs); storage tanks (VOCs)"

Alison – if you sent me the zip file I didn't receive it so maybe it did get screened out. Could you try again with a different extension?

Thanks,

Cathe

From: Cathe Kalisz

Sent: Tuesday, June 13, 2017 10:00 AM

To: 'Eyth, Alison'; Possiel, Norm

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Thanks, Alison. I think I can receive a zip file so if you can forward that would be great. I suspect our members will have the same problem as me with ftp files so this way I can provide them some pre-read information.

Maybe this is in the other files that you are going to send me, but how could a refinery, for example, know that Consent Decree NOx controls were applied for its facility? Is anyone from the rules group going to be on our call?

I think a webinar would be helpful so I can set it up and then make you or others at EPA the host – then you can share your screen and discuss a particular topic. We use Adobe Connect; if you want to test this out ahead of time just let me know.

From: Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]
Sent: Tuesday, June 13, 2017 9:44 AM
To: Possiel, Norm; Cathe Kalisz
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Hi Cathe,

I've attached the summary file from the FTP site that shows the impacts to each sector for each rule by county. You'll see that the individual tabs reference the control programs (e.g., Boiler MACT, OilGas NSPS, ...).

Can you accept a zip file through email? If so, I could send the zip file of specific packages as well, or if it's helpful, rename the extension to .piz so it will get through.

If you think a webinar will be more effective, we could try that. I haven't run many webinars, although I've participated in quite a few. We do have the ability to initiate them, but if it's straightforward for you to set one up and pass control to us when that makes sense, that would be fine.

Thanks,

Alison

From: Possiel, Norm
Sent: Tuesday, June 13, 2017 9:17 AM
To: Cathe Kalisz <kaliszc@api.org>
Cc: Eyth, Alison <Eyth.Alison@epa.gov>
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Cathe,

I'm out of the office today, but I've cc'd Alison Eyth of EPA's Emissions Inventory and Analysis Group on this reply. Alison provided the links to the inventory documentation I sent last night. She and other folks in the inventory group will be "on point" from EPA for the call on the 19th.

Alison, can you please reply to Cathe with your thoughts on using a webinar for the discussion between EPA and API on the NODA topics of interest to API?

Thanks,

Norm

From: Cathe Kalisz [<mailto:kaliszc@api.org>]
Sent: Tuesday, June 13, 2017 9:08 AM
To: Possiel, Norm <Possiel.Norm@epa.gov>
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Norm,

Thanks for the information. Should we set up a webinar (I can do it or you can if you prefer) to facilitate the discussion? With respect to the regulations accounted for in the modeling, aside from the discussion in the TSD, do the control files indicate what's included? I can't access those files right now because of IT prohibitions on accessing ftp sites, so I need to work that out.

Thanks,

Cathe

From: Possiel, Norm [<mailto:Possiel.Norm@epa.gov>]
Sent: Monday, June 12, 2017 11:43 PM
To: Cathe Kalisz
Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Cathe,

Yes, June 19 at 2:00 pm EDT still works for us. In prep for this call, I'm sending along below several links to information that describe how we apply controls to sources of potential interest to API.

Norm

(1) What rules and regulations does EPA account for in the base year and future year emissions for refineries, chemical manufacturing plants and other sources operated by members of API?

The rules we've included in our modeling are described in our Emissions Modeling TSD for 2023, available in the docket and also here: https://www.epa.gov/sites/production/files/2017-01/documents/2011v6.3_2023_update_emismod_tsd_dec2016_002.pdf In particular, see Section 4, including Table 4-1 and the subsequent sections that relate to ptnonipm, pt_oilgas, and nonpt which describe things in more detail.

(2) How are existing regulations accounted for in EPA's modeling?

There are descriptions for much of this in Section 4 of the emissions modeling TSD. Please let us know if there are additional questions once you review the documentation.

(3) Where can API find data on control efficiencies that we applied to specific sources? Are all the relevant data in SMOKE packets?

In this directory <ftp://ftp.epa.gov/EmisInventory/2011v6/v3platform/reports/>, there are two files of interest:

[2023el_CoST_Projection_Summaries.xlsx](#) provides summaries of the impacts of the control packets by each control program, county, and pollutant for each emissions modeling sector.

[2023el_CoST_Projection_Packets.zip](#) provides the actual detailed packets as they are fed into the Control Strategy Tool as .csv/.txt files that are prioritized and applied to the inventories according to the hierarchy described in Section 4.2.1 of the emissions modeling TSD.

(4) What is the format of the file(s) with control information?

The control files are .csv and .txt files that are read by the Control Strategy Tool.

From: Cathe Kalisz [<mailto:kaliszc@api.org>]

Sent: Monday, June 12, 2017 3:16 PM

To: Possiel, Norm <Possiel.Norm@epa.gov>

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Norm,

Does June 19 at 2PM still work? I've heard back from enough folks to know that's a good day/time.

Cathe

From: Possiel, Norm [<mailto:Possiel.Norm@epa.gov>]

Sent: Tuesday, June 06, 2017 9:23 AM

To: Cathe Kalisz

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Cathe,

Here are some possible dates/times (EDT) that would work for us for a follow-up call on API's questions and comments on the 2015 NAAQS preliminary transport NODA.

Monday, June 19 at either noon or 2:00 pm

Monday, June 26 at 2:00 pm

Thursday, June 29 any time between 11:00 am and 3:00 pm

Can you please check to see if any of these will work well for the API members who would want to participate in this call?

Also, based on your email below I took a shot at some specific questions to help guide the discussion. Please feel free to modify these as need be.

(1) What rules/regulations and consent decrees does EPA account for in the base year and future year emissions for refineries, chemical manufacturing plants and other sources operated by API member groups?

(2) How does EPA account for and apply existing regulations to these sources for EPA's air quality modeling?

(3) Where can API find data on control efficiencies that were applied to specific sources? Are all the relevant data in SMOKE packets?

(4) What is the format of the file(s) with control information?

(5) Where is the documentation on all of the above?

Thanks,

Norm

From: Cathe Kalisz [<mailto:kaliszc@api.org>]

Sent: Wednesday, May 17, 2017 1:46 PM

To: Possiel, Norm <Possiel.Norm@epa.gov>

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Norm,

I touched base with our members and one follow-up discussion topic that would be helpful is the process for determining baseline/future emissions for refineries and chemical plants and how regulatory and Consent Decree control requirements get incorporated into modeling inputs. I think you mentioned on our earlier call that the rules group works with NEI staff to come up with the SMOKE packets, and folks are interested in how EPA applies regulation-driven emissions reductions across facilities for modeling purposes. You also indicated that you could provide information on how to access facility emissions data or provide it separately if it's not posted on an EPA website.

Emissions estimating practices for oil and gas sources is another area that we may ultimately want to discuss, although for the near future the API member groups that cover this area are tied up with NSPS OOOOa issues.

For the first item, please let me know if you need more specifics in order to schedule the appropriate people for a call.

Thanks,

Cathe

From: Possiel, Norm [<mailto:Possiel.Norm@epa.gov>]

Sent: Tuesday, May 02, 2017 10:01 AM

To: Cathe Kalisz

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Cathe,

Monday, May 8 at 3:00 pm EDT would work well for me. I will call you then at (202) 682-8318.

Norm

From: Cathe Kalisz [<mailto:kaliszc@api.org>]

Sent: Monday, May 01, 2017 2:01 PM

To: Possiel, Norm <Possiel.Norm@epa.gov>

Subject: RE: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Norm,

Thanks for reaching out. I'm out of the office all this week and at the moment don't have phone access (out of the country). Could we have that call at 3PM EDT on Monday 5/8?

Cathe

Cathe Kalisz, P.E.

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From: Possiel, Norm [<mailto:Possiel.Norm@epa.gov>]
Sent: Monday, May 01, 2017 1:51 PM
To: Cathe Kalisz
Subject: API Comments on 2015 Ozone NAAQS Preliminary Transport Modeling NODA

Hi Cathe,

I'm reaching out to you as a follow-up to the April 20th meeting between members of API and EPA's Air Quality Assessment Division here in RTP. At that meeting we agreed to set up a call to discuss API's questions and comments on the 2015 ozone NAAQS transport NODA. Perhaps you and I can have a brief conversation sometime this week to help plan for that call. If this you agree, please feel free to call me at your convenience.

Norm Possiel
US EPA/OAR/OAQPS/AQAD
(919) 541-5692